J. STEPHEN STREET 1573-0
Attorney At Law
134 Maono Place
Honolulu, Hawaii 96821
Telephone No.: (808) 754-1647
Facsimile No.: (888) 334-6499
E-mail: jsstreet@ip-law-hawaii.com

DANE ANDERSON 9349-0
Attorney At Law, LLLC
P.O. Box #1621
Honolulu, Hawaii 96806
Telephone No.: (808) 285-4760
E-mail: dane@andersonlawhawaii.com

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

VINCENT KHOURY TYLOR, Plaintiff, vs. CRUISE.COM, INC., a Delaware Corporation, dba CRUISE.COM; JOHN DOES 1-10; JANE DOES 1-10; DOE CORPORATIONS 1-10; DOE PARTNERSHIPS 1-10; and DOE ASSOCIATIONS 1-10, Defendants.	CIVIL NO. 15-00203 KSC (Copyright Infringement) PLAINTIFF'S SCHEDULING CONFERENCE STATEMENT; CERTIFICATE OF SERVICE

PLAINTIFF'S SCHEDULING CONFERENCE STATEMENT

Pursuant to the Court's Order on August 11, 2015, continuing the Rule 16 Conference in this matter to October 27, 2015, and Local Rule 16.2(b) of the Rules of the United States District Court for the District of Hawaii, Plaintiff VINCENT KHOURY TYLOR ("Plaintiff"), hereby submits his Scheduling Conference Statement.

I. BACKGROUND AND NATURE OF THE CASE

This is an action for preliminary and permanent injunctive relief and damages arising from Defendant CRUISE.COM, INC.'s ("Defendant") copyright infringements in violation of the United States Copyright Act, 17 U.S.C. §§ 101 *et seq*. and violations of the Digital Millennium Copyright Act, 17 U.S.C. § 1202.

II. JURISDICTION AND VENUE

This Court has jurisdiction over the subject matter of this action under 28 U.S.C. § 1331 and § 1338(a). Venue is proper in this district under 28 U.S.C. § 1391(b) and (c) and 28 U.S.C. § 1400. In Defendant's Answer to the Complaint filed by counsel for Defendant on August 10, 2015, as Dkt. 11, Defendant alleges that the Court lacks personal jurisdiction over Defendant and denies that venue is proper in this district; however, Defendant admits that Hawaii residents did comprise of some of its bookings in 2014 and 2015. The Court has personal jurisdiction over Defendant because it knowingly, systematically, and continuously transacts business and enters into contracts on an ongoing basis with and/or provides products or services to individuals or businesses in Hawaii and/or to individuals or businesses intending to travel to or conduct business in Hawaii, and it engaged in intentional acts that willfully infringed Plaintiff's copyrights knowing that those acts would adversely impact Plaintiff in the State of Hawaii. See Wash. Shoe Co. v. A-Z Sporting Goods Inc., 704 F.3d 668 (9th Cir. 2012).

III. JURY TRIAL DEMAND

No jury demand has been made.

IV. DISCOVERY DISCLOSURES

The parties agreed to the exchange of initial disclosures in this case by November 10, 2015.

V. DISCOVERY AND MOTIONS

Aside from the parties' agreement concerning initial disclosures, described previously, no other discovery is pending or has been completed. No motions have been filed.

VI. SPECIAL PROCEDURES

No special procedures were discussed by the parties.

VII. RELATED CASES

Plaintiff is not aware of any related cases.

VIII. ADDITIONAL MATTERS

Plaintiff intends to continue to work with Defendant to reach a prompt settlement of this case.

DATED: Honolulu, Hawaii, October 20, 2015.

/s/ Dane Anderson
J. STEPHEN STREET
DANE ANDERSON
Attorneys for Plaintiff